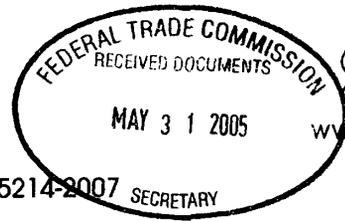


Cincinnati
Central
Credit Union

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May 24, 2005

Proposed Rule for FDICIA Disclosures, Matter No R411014
Federal Trade Commission/Office of the Secretary
Room H-159 (Annex A)
600 Pennsylvania Avenue, N.W.
Washington D.C. 20580

Dear Federal Trade Commission,

Cincinnati Central Credit Union was organized and chartered in 1937 to serve officers, directors and employees of credit unions in southwest Ohio. Over the years our field of membership has changed to include approximately 450 Select Employee Groups (groups of individuals not large enough to organize their own credit union) and communities in southwest Ohio. We have two branches in underserved, low-income communities. One branch serves the Lockland and Lincoln Heights Villages near Cincinnati, Ohio and a branch in the Over the Rhine neighborhood of the City of Cincinnati. Cincinnati Central Credit Union provides the opportunity for marginalized residents of the Over the Rhine community access to affordable, safe and secure lifeline financial services. We work with a 501-C-3 non-profit to provide remedial financial counseling and special loan programs.

Cincinnati Central Credit Union has been privately insured since the option was available. With the passage of FDICIA in 1994, Cincinnati Central Credit Union mailed the required notices to our approximately 20,000 members at a significant expense to the credit union. We make every effort to comply with all the disclosure requirements of FDICIA, especially with new members who join the credit union.

It is a challenge to reach out to underserved communities and provide safe and affordable services to the low-income residents. The Over the Rhine branch, which we have maintained since 1988, operates at a loss. Another all member mailing to our over 24,000 members would be an excessive financial and operational burden.

Thank you for your consideration in not requiring an all member disclosure mailing.

Sincerely,

William A. Herring, President/CEO
Cincinnati Central Credit Union